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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MCW, INC., d/b/a BERNARD HALDANE ASSOCIATES,	
PLAINTIFF,	
v.	**CIVIL ACTION**
BADBUSINESSBUREAU.COM, LLC, d/b/a,WWW.RIPOFFREPORT.COM and WWW.BADBUSINESSBUREAU.COM, and EDWARD MAGEDSON, a/k/a ED MAGIDSON,	**No. 3:02-CV-2727-G**
DEFENDANTS.	

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
OCT - 6 2003
CLERK, U.S. DISTRICT COURT
By Deputy

PLAINTIFF'S MOTION FOR LEAVE TO SUPPLEMENT OPPOSITION TO DEFENDANTS' MOTION TO DISMISS WITH NEWLY DISCOVERED EVIDENCE

Plaintiff MCW, Inc., d/b/a Bernard Haldane Associates ("Plaintiff"), files this motion requesting leave to supplement its opposition to Defendants Edward Magedson and badbusinessbureau.com, LLC's Motion to Dismiss for Lack of Jurisdiction and Failure to State a Claim ("Defendants' Second Rule 12(b) Motion")[1] with newly discovered evidence and would respectfully show the Court as follows:

PROCEDURAL BACKGROUND

1. On March 19, 2003, Defendants Edward Magedson ("Magedson") and badbusinessbureau.com, LLC's (the "LLC," collectively with Magedson, "Defendants") filed Defendants' Second Rule 12(b) Motion.

[1] On January 31, 2003, Defendants filed their First Rule 12(b) Motion, which only challenged service of process. U.S. Magistrate Judge Paul Stickney, following a hearing, concluded that service of process was proper, denied Defendants' First Rule 12(b) Motion, and ordered the Defendants to answer this lawsuit. Despite that Order, Defendants filed a Second Rule 12(b) Motion which is now pending before the Court.

2. On April 7, 2003, Plaintiff filed Plaintiff's Response to Defendants' Motion to Dismiss for Lack of Jurisdiction and Failure to State a Claim ("Plaintiff's Opposition").

3. On April 21, 2003, Defendants filed Defendants' Reply in Support of Motion to Dismiss for Lack of Jurisdiction and Failure to State a Claim ("Defendants' Reply").

4. On May 7, 2003, the Court denied Plaintiff's request for leave to file a surreply in response to new evidence and arguments raised in Defendants Reply.

5. Accordingly, Defendants' Second Rule 12(b) Motion is before the Court awaiting decision.

EVIDENCE TO BE SUPPLEMENTED

Plaintiff seeks to supplement the record and provide the Court with newly discovered evidence which is relevant to Defendants' Second Rule 12(b) Motion. A copy of this newly discovered evidence is attached hereto as Exhibit "1" and incorporated herein by reference, the original and two copies of which are submitted separately for filing.[2] This evidence was not made known to Plaintiff until September of 2003. As briefly described below, this newly discovered evidence further supports the conclusion that Defendants are not entitled to immunity under the Communication Decency Act ("CDA").

BRIEF EXPLANATION OF NEWLY DISCOVERED EVIDENCE AND ITS RELEVANCE

To enjoy immunity under the CDA, Defendants must establish, separately: (1) that they each are an interactive computer service; (2) that they each are not the information content provider with respect to the disputed activity; and (3) that Plaintiff seeks to hold them liable for information originating with a third-party.[3] An information content provider is "any person or entity that is responsible, *in whole or in part*, for the creation or development of information provided through the Internet or any other interactive computer service."[4] Where a website prohibits people from posting information freely, tailors posting through its own actions, and contributes to the content on the site, that website is not entitled to immunity under the CDA as it is "responsible, in part, 'for the creation or development of information'" on the site as it is taking "an active role in developing the information that gets posted."[5]

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[2] This newly discovered evidence consists of the Declaration of Ingrid Villanueva, attached as Exhibit "1" hereto, and email correspondence attached to the Declaration of Ingrid Villanueva as Exhibit "A."

[3] 47 U.S.C. § 230(c)(1).

As the newly discovered evidence attached hereto as Exhibit "1" confirms, Defendants are not acting simply as a mere conduit for the information. Instead, the Defendants are taking a vigorous role in developing the information that gets posted on the websites. For example, Defendants will alter, edit and in some cases delete emails from their websites, but only upon receiving substantial fees. As shown on Exhibit "1," Hy Cite Corporation was informed by Defendants that it must first send a "check for ***$30,000*** made payable to badbusinessbureau.com." *See* EMAIL FROM ED MAGEDSON TO INGRID VILLANUEVA, ATTACHED AS EXHIBIT A TO EXHIBIT 1 at page 2 (emphasis added). In exchange, Defendants offered the prospect of "all the reports [being] **UPDATED in a positive light**." *Id.* (emphasis added). The Defendants also claim they will edit the "Rip-off Report title." *Id.* at 1-2. Defendants' "pay-to-play plan" to Hy Cite Corporation then required Hy Cite Corporation to send Defendants "an additional ***$20,000*** with in 5 days **of the last Report being UPDATED**." *Id.* at 2. (emphasis added). Defendants "expect the payment to be sent over night mail to a designated address at that time." *Id.* But even this would not be enough. As an "additional cost," "30 days after the second payment of $20,000 [Defendants] would require a ***monthly retainer of $1,500.***" *Id.* at 3 (emphasis added). Thus, in exchange for $50,000 ***plus*** a monthly retainer of $1,500/month, Defendants offered to Hy Cite Corporation a way to avoid "a

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4 47 U.S.C. § 230(f)(3) (emphasis added).

5 *Carafano v. Metrosplash.com, Inc.*, 207 F. Supp.2d 1055, 1067 (C.D. Cal. 2002).

possible new Rip-ff [sic] Report being reported" as the Defendants will, apparently, remove them or prohibit them from being posted for some unknown period of time. *Id.* (emphasis added).

Thus, as Exhibit "1" and Exhibit "A" thereto further demonstrate, there can be no doubt that Defendants are operating their websites not as consumer forums encouraging free speech but as a means to line their pockets. By offering to "update" postings, change titles and/or remove or prohibit other postings, the Defendants are taking such an active role in developing the information that gets posted that they are not entitled to immunity under the CDA because they are "responsible, in part, 'for the creation or development of information'" on the site.[6] Accordingly, for this reason and the numerous other reasons set forth in Plaintiff's Opposition, Defendants' Second Rule 12(b) Motion should be denied.

CONCLUSION/PRAYER

For the foregoing reasons, Plaintiff respectfully requests that the Court grant leave for Plaintiff to supplement the record with the newly discovered evidence attached hereto as Exhibit "1" and incorporated herein by reference, the original and two copies of which are submitted separately for filing.

[6] 47 U.S.C. § 230(f)(3); *Carafano v. Metrosplash.com, Inc.*, 207 F. Supp.2d 1055, 1067 (C.D. Cal. 2002).

Dated: October 6, 2003

Respectfully submitted,

Thomas B. Walsh, IV

Matthew E. Yarbrough
Texas Bar No. 00789741
Thomas B. Walsh, IV
Texas Bar No. 00785173
Kelly D. Hine
Texas Bar No. 24002290
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FISH & RICHARDSON P.C.
5000 Bank One Center
1717 Main Street
Dallas, Texas 75201
(214) 747-5070 (Telephone)
(214) 747-2091 (Facsimile)

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that on October 3 and again on October 6, 2003, I attempted to confer with counsel for Defendants regarding the relief sought in this motion. More specifically, I left voice mail messages for both Maria Speth in Phoenix, Arizona and Garth Fennegan in Dallas informing them that I wished to conference with them on a motion for leave. On October 6, 2003, Garth Fennegan called me back and told me that he could not agree to the motion for leave as he was working in a local counsel capacity only. As of the time of the filing of this motion, Ms. Speth has not returned my voice mail messages left on two separate days. Accordingly, Plaintiff presumes that this motion for leave is opposed and submits this motion for leave to the Court for determination.

Thomas B. Walsh, IV

Thomas B. Walsh, IV

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served as shown below on October 6, 2003, on the following counsel of record:

Maria Crimi Speth Jaburg & Wilk P.C. 3200 N. Central Avenue Suite 2000 Phoenix, AZ 85012	Via FedEx
J. Garth Fennegan Settle & Pou, P.C. Fitzhugh Central Building, Suite 100 4131 N. Central Expressway Dallas, Texas 75204	Via Hand Delivery

COUNSEL FOR DEFENDANTS

Thomas B. Walsh, IV

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MCW, INC., d/b/a BERNARD HALDANE ASSOCIATES, **PLAINTIFF,** **v.** **BADBUSINESSBUREAU.COM, LLC, d/b/a, WWW.RIPOFFREPORT.COM and WWW.BADBUSINESSBUREAU.COM, and EDWARD MAGEDSON, a/k/a ED MAGIDSON,** **DEFENDANTS.**	**CIVIL ACTION** **No. 3:02-CV-2727-G**

DECLARATION OF INGRID VILLANUEVA

INGRID AREVALO VILLANUEVA, being of full age, hereby declares:

1. Until recently, I was a Bilingual Executive Assistant at Hy Cite Corporation ("Hy Cite"), 333 Holtzman Road, Madison, WI 53713.

2. Attached hereto as Exhibit A is a true and correct copy of email correspondence I exchanged with Ed Magedson, Editor at Badbusinessbureau's website ripoffreport.com, during the time period June 24 - July 11, 2003. This correspondence occurred in the course of my business duties at Hy Cite. Each item was sent or received on the date it bears. These copies were made from my records of business email correspondence kept in the regular course of my business duties at Hy Cite.

3. While the emails from Badbusinessbureau requested payment from Hy Cite, we did not pay them. The postings about Hy Cite have not been removed by Badbusinessbureau. Hy Cite filed suit against Badbusinessbureau to have them enjoined, among other relief. That action is presently pending.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: ~~September~~ Oct 1, 2003

Executed at: Madison, WI

INGRID AREVALO VILLANUEVA

A

<http://www.ripoffreport.com/reports/> Rip Off Report Logo
Don't let them get away with it.
Make sure they make the Rip Off Report!

July 11, 2003

badbusinessbureau.com
Corporate Customer Advocacy Program
Assisting companies working towards a better image

Hy Cite - Royal Prestige
Ingrid C. Ar?valo Villanueva (608) 273-3373 x 6126

Ingrid,

As you have seen, the web site (RipoffReport.com) has the goal to help consumers. That was the mission we founded it on, and what we strive for. For some it is a venting place for others they use it to seek out and learn from others mistakes. For the Authorities and the media, it has been a valuable tool in locating victims of rip-offs. What we hope it will become, and it has started to, is a place also for business to recognize theirs and do what is just and fair to fix them.

We are non-tax deductible donation supported to help cover our monthly costs. We get very little from consumers, but have found that the business we have helped are very supportive, and use us as their advocacy team. For these services we do incur costs, resources and a lot of time. This is why we created the Corporate Customer Advocacy Program.

Basically it allows a company to work with our advocates, and reach out to these unhappy consumers and right the wrongs. It puts you in a good light, shows the value of our site, and most importantly for both of us wins over consumers to really value a company that would take the time to care. This is what our program is all about, making good companies shine above the bad.

Here is what we will do, and what HY Cite will do, and what badbusinessbureau.com will get for their service?

What badbusinessbureau.com will do:

After your written approval, we will E-mail all the consumers who feel they were victimized, stating that they will get a full refund plus a min of 5% more for their inconvenience explaining (something to the effect of) management did not realize this was going on, and they are glad (as we discussed by phone) that these Rip-off Reports were there to let them know of the problems. With over 900 offices, there will always be some complaints and things happening out of their control. And the fact that your company seems to be happy this was brought to your attention, wanting to rectify a problem you were not aware of and are now fixing it and offering a full refund. We can also explain the fact that these are independent offices and you have not control as you explained on the phone.

We will include in a mailing to the unsatisfied customers a contact number and e-mail address of a specific person handling these complaints at Hy Cite?

Once a complaint is resolved, the Report will be updated in the Rip-off

Report title to show the companies willingness to work with their customer.

Rip-off Report will contact Hy Cite within 48 hours of a NEW posted Rip-off Report. As we notify your designated person, we will e-mail the unsatisfied customer on who to contact, because your company wants to take care of all these situations.

We will also include a link onto the specific Rip-off Reports about your company, a statement from Hy Cite (which you will write) .. that will be your letter to existing and future consumers on why are you helping them, something about your business and your commitment to getting to the bottom of these problems. This will be very convincing to any consumer to do business with you after looking at the specific Rip-off Report on your company.

If for some reason the consumer will not respond to our mailing, we will try calling them, If we get no response, at all, we will then UPDATE The Report as to our investigation, and the title and the Report will reflect Hy Cites willingness to satisfy this customer, but apparently they either filed a bogus Report, or they are a disgruntled employee, a competitor etc, what ever our findings, with some assistance from you, as to the possibilities of why they did not respond, the Report will reflect that and will definitely put you in a good light, if any customer reads any Rip-off Report on you, ..because you will be trying to make all the unsatisfied customers happy.

What Hy Cite needs to do:

Live up to their agreement to satisfy all complaints that come to Rip-off Report

Hy Cite will only give a refund if they have the web address of the customers specific Rip-off Report, so when the customer has been satisfied, that info will be sent to <mailto:CorporateAdvocacy@ripoffreport.com> CorporateAdvocacy@ripoffreport.com, so Rip-off Report can assist your customer, making sure they UPDATE the Report to let everyone know what good business people you are.

What badbusinessbureau.com will receive for this service:

We see that you have about a total of about 25 to 30 complaints.

After you submitted to us your explanation as to the reason for these complaints, badbusinessbureau.com will evaluate your statement, to see if we can work with it to make this program work..

If accepted , before the mailing goes out to start this Corporate Customer Advocacy Program to your unsatisfied customers, we will require a check for $30,000 made payable to badbusinessbureau.com. Once this mailing goes out, and all the reports are UPDATED in a positive light by either HY Cite refunding their money or by stating Hy Cite tried to refund and the author of the report was either a disgruntled employee..etc etc ?

Once all the Reports are updated, we would receive an additional $20,000 with in 5 days of the last Report being UPDATED, we would notify you by e-mail . We will notify Ingrid (or whoever you designate) of this, and would expect the payment to be sent over night mail to a designated address at that time?

ALSO (additional cost) :

badbusinessbureau.com is willing to assist in any investigation or complaints about your company, and willing to explain your willingness to comply as we truthfully see it. You may have prospective customers and possible franchises call us..

If we get any e-mail on your company or a Rip-off Report comes in, that indo will be immediately be forwarded to your designated employee. We will give you a chance to take care of the situation avoiding a possible new Rip-off Report being posted.

Starting 30 days after the second payment of $20,000 we would require a monthly retainer of $1,500. Assuming the e-mail complaints and or Rip-ff Reports do not exceed more than 4 a month?

IN Closing:

You should know, we looked hard at your situation, and called several of the Report Authors on your company, ..this is a difficult case, where it is hard for us to understand why your company and your independent offices treated these people they way they have as these customers truly feel very violated.

We feel this will make authorities take another look at what you are doing before furthering any investigation, as they will see you are taking care of business, even though it may not be all Hy Cites fault, because you cannot watch every move across the country?

We feel by you doing this program, you will be able to use it with future clients as a sales tool as to how you do business? after all? Every company receives complaints, but how they handle those complaints separates good business from bad business.

Sincerely,

ED Magedson 602-359-4357
Editor@ripoffreport.com
badbusinessbureau.com

-----Original Message-----
From: Ingrid Arevalo Villanueva [mailto:iarevalo@hycite.com]
Sent: Thursday, July 10, 2003 11:11 AM
To: EDitor@ripoffreport.com
Subject: RE: Corporate Customer Advocacy program RE: Hy Cite - Royal Prestige - World Enterprise - Contemporary Lifestyles - 21st Century - Southern Bridal Registry

Based your pricing on the following company names: Hy Cite Corporation & Royal Prestige.
Will wait for your pricing reply.

Ingrid
-----Original Message-----
From: EDitor@ripoffreport.com [mailto:EDitor@ripoffreport.com]

Sent: July 10, 2003 11:52 AM
To: 'Ingrid Arevalo Villanueva'
Subject: Corporate Customer Advocacy program RE: Hy Cite - Royal Prestige - World Enterprise - Contemporary Lifestyles - 21st Century - Southern Bridal Registry
Can you give me the complete list of all the company names that may be on Rip-off Reprot.com that have to do with your main offices, so we may quote you accordingly..

Also, I need to talk to you from a land line so I can better explain what we last spoke about by phone,. If Brad did not hear more than 50% of what I was saying, then you did not either..

When would be a good time to call.

Please continue sending back the entire e-mail with your response please.

ED Magedson

-----Original Message-----
From: Ingrid Arevalo Villanueva [mailto:iarevalo@hycite.com]
Sent: Thursday, July 10, 2003 8:30 AM
To: EDitor@ripoffreport.com
Subject: RE: Corporate Customer Advocacy program RE: Hy Cite - Royal Prestige - World Enterprise - Contemporary Lifestyles - 21st Century - Southern Bridal Registry

I talk to my company's CEO. In order to make a better decision we need you to please send us pricing information.
Please send it via e-mail to my attention.

Thank you,

Ingrid
-----Original Message-----
From: EDitor@ripoffreport.com [mailto:EDitor@ripoffreport.com]
Sent: July 09, 2003 3:38 AM
To: iarevalo@hycite.com
Cc: bsmith@ripoffreport.com; EDitor@ripoffreport.com
Subject: FW: Corporate Customer Advocacy program RE: Hy Cite - Royal Prestige - World Enterprise - Contemporary Lifestyles - 21st Century - Southern Bridal Registry
Please send back this entire e-mail with your response...
I do not think you heard my whole conversation and you have completely misunderstood what I said on the phone according to Brad who was on the phone with us, as I was on a cell phone and he said 50% of what I said was not understandable..
Let me know when we should call you back...
ED Magedson

Ingrid C. Ar?valo Villanueva
Bilingual Executive Assistant (608) 273-3373 x 6126
iarevalo@hycite.com

What other company names do you go by?

Hy Cite - 5 ....

Royal Prestige 16

1. World Enterprise - 1
2.
3. Contemporary Lifestyles 1
4.
5. - 21st Century 6
6.
7. - Southern Bridal Registry 2

-----Original Message-----
From: Ingrid Arevalo Villanueva [mailto:iarevalo@hycite.com]
Sent: Tuesday, July 08, 2003 6:34 AM
To: EDitor@ripoffreport.com
Subject: RE: Corporate Customer Advocacy program RE: Hy Cite - Royal Prestige - World Enterprise - Contemporary Lifestyles - 21st Century - Southern Bridal Registry

Thank you for your reply.
I want to know also how much does your company charge for this service?
Also, if I understood correctly, the suggestion is to refund the customers full price plus 15%? please re-confirm or clarify.
Will wait for your reply before going forth with my company's decision.

Thank you,

Ingrid Ar?valo
-----Original Message-----
From: EDitor@ripoffreport.com [mailto:EDitor@ripoffreport.com]
Sent: July 07, 2003 11:35 PM
To: iarevalo@hycite.com
Cc: EDitor@ripoffreport.com
Subject: Corporate Customer Advocacy program RE: Hy Cite - Royal Prestige - World Enterprise - Contemporary Lifestyles - 21st Century - Southern Bridal Registry
Ingrid,

Sorry for the delay in responding to you. My staff was out for the holiday week.

We do offer a program for businesses who are looking to clean up their consumer complaints by fixing any improprieties in the way they have transacted business. The program, called the "Corporate Customer Advocacy Program" allows any size business to handle complaints efficiently and effectively, turning a once negative scenario into a positive customer service experience.

Several recent companies participating actually landed business from the way they handle the complaints listed on our site. (Their words, not ours!) We help highlight the good businesses from those that are just out to make a fast buck.

The program is quite simple:

We will assign an advocate from our staff to contact each victim who has posted a compliant. They verify via a series of two emails and ultimately a phone call to make sure the report filed is valid and not another company trying to disparage you or an ex-employee with a vendetta.

Once the people are reached they are given a special way to contact your corporation identified as participating in the Corporate Customer Advocacy program representative. Most companies have a special phone number and email setup, and a person that is geared to help refund, answer questions and willing to calm the often upset customers. Typically a refund amount if full price of what the customer paid and not in excess of 15% extra. This is something the advocate and your company can work out depending on the severity of the complaints. We do insist on a minimum of 15% extra given as good gesture for the unsatisfied customers inconvenience. This will make the customer very satisfied, it will show you were sincere, and the customer will be boasting about our good will.

Then once the re-funds are issued, we re-contact the customers to insure they update their rip-off report to add a positive spin. The positive comments will be added to the specific Rip-off Report you refunded their money on. We will also add a link on each report stating your company has agreed to participate in helping people who felt an injustice. This letter is crafted by your team with input and review by your assigned advocate.

We have found this program gets companies results, positive media, and generates a lot of goodwill among upset customers and those they talk to.

First we determine all the names your company has showrooms under, as you can see from the title we have found a few. Then we can figure out how many consumers have reported issues and pull the contact information.

Hy Cite - Royal Prestige - World Enterprise - Contemporary Lifestyles - 21st Century - Southern Bridal Registry

Please, when responding, please, you MUST include this entire e-mail with the list of names of companies you go under so we can see if we can help you with all these Rip-off Reports..

Please feel free to contact me by e-mail for now, ...about prices and time involved, but we can assign someone immediately to begin working with you.

Thanks,

ED Magedson
EDitor@RipoffReport.com
badbusinessbureau.com
<http://www.ripoffreport.com/> www.ripoffreport.com

We are not lawyers.
We are not a collection agency.

We are Consumer Advocates.
...the victims' advocate

WE are Civil and Human Rights Activists

We are a Nationwide Consumer Reporting News Agency
..by consumers, for consumers

DONATIONS may be sent to &
Victims & Volunteers ONLY may respond to:
badbusinessbureau.com
PO Box 310 - Tempe, Arizona 85280

Florida Message Phone and office FAX: 305-832-2949
Washington office FAX: 425-799-9729

You may also DONATE by Paypal, ..click on the donate ad "Help keep this site Free" at the top left of every Rip-off Reprot(tm), OR
Click on the ad at the very bottom of every Rip-off Rerpot(tm).

Remember.
Don't let them get away with it!(tm)
Make sure they make the Rip-off Report(tm)

-----Original Message-----
From: Ingrid Arevalo Villanueva [<mailto:iarevalo@hycite.com> mailto:iarevalo@hycite.com]
Sent: Tuesday, June 24, 2003 7:49 AM
To: editor@ripoffreport.com
Subject: Consumer complaints
Importance: High
Good morning,
My name is Ingrid Ar?valo and Hy Cite Corporation is asking you to please helps us resolve the consumer complaints that are listed in the badbusinessbureau.com report. I understand your organization will be contacting the customers that need to have their complaints resolved. If you can please start this process Hy Cite Corporation assures you it will do all it can to get the complaint/problem solved whenever possible. Please keep me informed as to the progress and advice on the procedure to follow once you contact the consumers involved.
Sincerely,
Ingrid C. Ar?valo Villanueva
Bilingual Executive Assistant
(608) 273-3373 x 6126
iarevalo@hycite.com

------=_NextPart_001_0DF8_01C347A3.0FF39990
Content-Type: text/html;
charset="iso-8859-1"
Content-Transfer-Encoding: quoted-printable

<!DOCTYPE HTML PUBLIC "-//W3C//DTD HTML 4.0 Transitional//EN">
<html xmlns:v="urn:schemas-microsoft-com:vml" xmlns:o="urn:schemas-microsoft-com:office:office" xmlns:w="urn:schemas-microsoft-com:office:word" xmlns:st1="urn:schemas-microsoft-com:office:smarttags" xmlns="http://www.w3.org/TR/REC-html40">

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<META HTTP-EQUIV="Content-Type" CONTENT="text/html; charset=iso-8859-1">

<meta name=ProgId content=Word.Document>
<meta name=Generator content="Microsoft Word 10">
<meta name=Originator content="Microsoft Word 10">
<link rel=File-List href="cid:filelist.xml@01C347A2.B60AA1D0">
<link rel=Edit-Time-Data href="cid:editdata.mso@01C347A2.B60AA1D0">
<!--[if !mso]>
<style>